



T. A. BLACKBURN LAW

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March 23, 2024

VIA PACER:

Hon. J. Paul Oetken
Thurgood Marshall, United States Courthouse
40 Foley Square
New York, NY 10007

Re: Jones v. Combs, et al.; Case No. 24-1457

Dear Judge Oetken,

I am writing to provide Your Honor with an update regarding the above-referenced matter on behalf of the Plaintiff. On March 21, 2024, Plaintiff entered into an agreement with Defendant Ethiopia Habtemariam ("Habtemariam"). Under this agreement, in exchange for a declaration that will be appended to the forthcoming amended complaint, the Plaintiff has agreed to dismiss all claims against Habtemariam with prejudice.

Furthermore, the Plaintiff has elected to dismiss the claims against Chalice Recording Studio ("CRS") without prejudice. This decision enables the Plaintiff to refile these claims in Los Angeles, California, where CRS is headquartered. These dismissals are made pursuant to F.R.C.P. 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure.

Although they have been in constant contact with this writer through threatening emails and letters, the remaining defendants have yet to appear in the case. Instead, Defendant Sean Combs (through his representatives) has engaged in concerning behavior, including manufacturing stories about Plaintiff on TMZ and dispatching his agents to harass Plaintiff's 8-year-old daughter, the mother of his child, and ex-spouses, all of whom have expressed fear of potential harm by Defendant Combs. Moreover, Defendant Sean Combs has attempted to contact Plaintiff through third parties to persuade Plaintiff to terminate this writer and hire counsel who has a relationship with



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Defendant Combs. These actions have compelled the Plaintiff and his loved ones to file a police report. This writer has raised concerns surrounding this harassing behavior, and they doubled down and indicated that their harassing behavior will continue. Consequently, the Plaintiff has reported these actions to the California, New York, and New Jersey State Bars.

Regarding Defendants United Music Group, Lucian Grainge, and Motown Records, their representative has declined to engage with this writer despite several emails requesting a call to discuss the Plaintiff's claims. He has sent multiple contradictory emails and letters filled with empty threats. He went so far as to misleadingly represent that he is counsel to Ms. Habtemariam, a misrepresentation that was promptly discovered through discussions with Ms. Habtemariam's actual counsel. Despite reminding him of his professional duty to engage with opposing counsel to seek a resolution on behalf of his client, he chose instead to hurl insults and boast about his legal experience spanning over 50 years.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

Tyrone A. Blackburn, Esq.
Tyrone A. Blackburn, Esq.

CC: All attorneys of record via ECF.

